

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	Chapter 11
	:	
GLORIA TADDEI	:	Case No. 17-15877 (MDC)
	:	
	:	
	:	
Debtor.	:	
	:	

**RESPONSE TO ACTING UNITED STATES TRUSTEE'S
MOTION TO CONVERT OR DISMISS CASE**

Gloria Taddei (the “Debtor”) by and through her undersigned attorneys, hereby files this Response to Acting United States Trustee’s Motion to Convert and respectfully states as follows:

1. The Debtor is ineligible for Chapter 13 relief because her debts exceed the Bankruptcy Code’s debt limit, thereby rendering Chapter 11 the only non-liquidation relief she could seek. The Debtor intends to reorganize her debts in an effort to prevent losing two homes to foreclosure.

2. The Trustee is correct that the Debtor’s illness has caused this case to be delayed. The Debtor is in her mid-80’s and suffered major health issues this winter, which required a hospitalization lasting weeks in January and February. The Debtor is now rehabilitating in a medical facility and expects to regain some independence in the next few months.

3. The Debtor is competent to execute legal documents and to provide meaningful assistance in this bankruptcy case, albeit with physical limitations regarding her mobility.

4. The Debtor has executed a power of attorney and has given her son, John Taddei, the authority to act on her behalf with the assistance of counsel. John Taddei is able to perform all tasks required of the Debtor and attend all required appearances.

5. Alternatively, or in addition to John Taddei's involvement, the Debtor is able to participate in the bankruptcy case telephonically with reasonable accommodations provided by this Court and the Office of the United States Trustee.

6. The Debtor requests that the Court deny the United States Trustee's motion. The Debtor's health issues have stabilized and the Debtor is confident that she will be able to successfully reorganize her debts through a chapter 11 plan.

WHEREFORE, the Debtor respectfully requests entry of an Order denying the United States Trustee's Motion to Convert or Dismiss.

Dated: March 27, 2018

FLASTER/GREENBERG P.C.

By: /s/ Damien Nicholas Tancredi

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